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August 1, 2003

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FEOFRAL COMMUNICATIONS COMMISSION OFFICE OF THE SECRETARY

Marlene H. Dortch, Secretary Federal Communications Commission 445 12th Street, S W Washington, DC 20554

Re.

Dobson Cellular Systems, Inc

E911 Quarterly Report - CC Docket No 94-102

Dear Ms. Dortch

Dobson Cellular Systems, Inc. and its subsidiaries, by its attorneys, hereby submit the attached E911 Quarterly Report on their progress toward and compliance with the terms and conditions of the *Order to Stay* and the Commission's E911 rules ¹

If there are any questions regarding this matter, please contact the undersigned.

Sincerely,

WILKINSON BARKER KNAUER, LLP

By.

Lawrence J Movshin William R. Layton

Attachment

David Solomon, Chief, Enforcement Bureau
John Muleta, Chief, Wireless Telecommunications Bureau
John Ramsey, Executive Director, APCO
Robert M Gurss, Counsel for APCO
W Mark Adams, Executive Director, NENA
James R Hobson, Counsel for NENA and NASNA
Evelyn Bailey, President, NASNA

¹ See Revision of the Commission's Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems, CC Docket No. 94-102, Order to Stay, 17 FCC Rcd 14841 (2002)

E911 Status – Quarterly Report CC Docket No. 94-102 August 1, 2003

Summary of Report

Pursuant to the *Order to Stay* and the Commission's Public Notice dated June 6, 2003, Dobson Cellular Systems, Inc., as a Tier II carrier, provides this E911 Quarterly Report ("Report"). The Report provides information on all Phase I and Phase II requests received by DCS, including the PSAP ID, Name, State, County, Implementation Phase, Air Interface, Date PSAP Request Made. Date PSAP Request Withdrawn, Invalid Request, Deployed, Date Deployed, Date Projected, Reasons and Comment Detailed information regarding the requests is contained in the attached chart

Phase I Service

DCS has received 76 requests for Phase I services and has activated service in 66 of these jurisdictions. DCS has worked diligently with its third-party location solution vendor, Intrado, as well as the public safety community, in coordinating Phase I deployment. The company remains committed to working with its vendors, the PSAPs, and state and local governments, in order to deploy Phase I services in these jurisdictions as soon as possible.

Phase II Service

A. Deployment Preparation

As discussed in its waiver petition, DCS is a mid-sized carrier servicing predominantly rural and suburban markets in 12 states ⁴ The company relies primarily upon a TDMA-based network of base stations and switching equipment ⁵ As a result of the lack of commercial

¹ See Revision of the Commission's Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems, CC Docket No. 94-102, Order to Stay, 17 FCC Red 14841 (2002) ("Order to Stay"), See Public Notice, "Wireless Telecommunications Bureau Standardizes Carrier Reporting on Wireless E911 Implementation," DA 03-1902 (rel June 6, 2003)

² The instant Report is filed on behalf of Dobson Cellular Systems, Inc. and its subsidiaries (collectively "DCS"). A separate report is being filed for American Cellular Corporation and its subsidiaries, which are affiliates of DCS.

³ As indicated in the attached chart, the provided "request date" indicates the date the PSAP/requesting entity sent its request to DCS. This date may not correspond with the date the PSAP's/requesting entity's request was "valid" per Section 20 18(j) of the rules. 47 C F R § 20 18(j), see also Revision of the Commission's Rules to Ensure Compatibility with Enhanced E911 Emergency Calling Systems, Petition of City of Richardson, CC Docket No. 94-102, Order, 16 FCC Red 18982, 18986-87 (2001) ("Richardson")

¹ DCS' ultimate parent, Dobson Communications Corporation, consummated an exchange of cellular markets with AT&T Wireless Services. Inc. on June 17, 2003. As a result, DCS is a cellular licensee in the Anchorage, Alaska MSA and the Alaska 2 – Bethel RSA and no longer provides cellular service in the State of California. See Public Notice, Report No. 1492 (rel. May 7, 2003) (granting File Nos. 0001209002, 0001208375, 00002-CL-AA-03 and 00003-CL-AA-03).

⁵ As noted by the Commission, DCS is in the process of overlaying its TDMA network with GSM/GPRS technology. See Annual Report and Analysis of Competitive Market Conditions with Respect to Commercial Mobile Services. WT Docket No. 02-379, Eighth Report, FCC 03-150 at ¶ 77 (rel. July 14, 2003)

availability of compliant handset-based Phase II location solutions for TDMA carriers, the company has taken steps to begin deployment of a network-based solution.

DCS's network consists of approximately 22 Mobile Switching Centers, a majority of which utilize equipment manufactured by Nortel Networks ("Nortel"), the rest utilizing Lucent Technologies ("Lucent") TDMA network equipment. DCS has worked with these equipment vendors to prepare for Phase II deployment, as all switch upgrades necessary to supply Phase II services were completed by Lucent by August, 2002 and by Nortel by June, 2002.

In addition, DCS has executed an exclusive contract with Grayson Wireless to provide the PDE equipment necessary to deploy its Phase II network-based location solution. The vendor has contracted to provide compliant Phase II services in Erie County, PA; Genesee County, NY; Cattaraugus County, NY; Chautauqua County, NY; and Austin County, TX as discussed below. DCS is currently deploying Phase II services to these jurisdictions in accordance with mutually agreed to timetables which have been negotiated or are currently under discussion with PSAPs

B. Phase II Requests

DCS has received requests for Phase II service from the following jurisdictions: Erie County, PA; Allegany, NY, Genesee County, NY; Cattaraugus County, NY; Chautauqua County, NY; Austin County, TX, Anchorage, AK and St. Mary's County, MD. The status of these requests is detailed in the attachment. For each request, DCS is proceeding with deployment in good faith, even for PSAPs who have not yet provided *Richardson* documentation.

To ensure that it may properly prioritize its E911-designated resources, DCS has requested each of these PSAPs to provide documentation pursuant to the *Richardson* criteria. DCS has received a response to its request from these PSAPs and is proceeding in good faith and has signed a contract with Grayson to provide Phase II capabilities in Erie, Cattaraugus, Genesee and Austin Counties—Furthermore, in Chautauqua County, DCS has also requested that the PSAP provide documentation pursuant to the *Richardson* criteria, and was notified by the LEC that the county is not ready to accept Phase II at this time. Finally, on February 11, 2003 DCS sent correspondence to Austin County requesting documentation pursuant to the *Richardson* criteria. DCS has received a reply from the county and considers Austin County's request valid.

C. Deployment Issues

In order to meet the Commission's network-based accuracy requirements, Grayson Wireless has informed the company that it will need to install Angle-of-Arrival ("AOA") antennas at certain cell sites in addition to the Time Difference of Arrival equipment that will be installed in individual cell sites. DCS has also been informed that installing AOA antennas may require tower modifications, lease modifications, and zoning approvals – any of which present the potential for delay.

⁶ Richardson, 16 FCC Red at 18986-87

 $^{^{7}}$ Id

DCS brought similar matters to the Commission's attention in its original waiver request. Accordingly, if necessary, DCS may avail itself of further waiver procedures to account for the potential market-specific shortcomings a network-based solution in its rural markets may present. The Commission has indicated that it will consider such requests. 9

As required by the *Order to Stay*, a copy of this report is being filed with the Chief of the Enforcement Bureau, the Chief of the Wireless Telecommunications Bureau, and the Executive Directors and Counsels of APCO, NENA, and NANSA

^{*} See Dobson Cellular Systems, Inc. Petition for Waiver of Sections 20 18(e), (f), and (h) of the Commission's Rules, CC Docket No. 94-102, at 11-15 (filed Sept. 4, 2001)

⁹ See Order to Stay, 17 FCC Rcd at 14853

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Marchage Brough TOMACSM OFFISTORY N V CAMBRIGGE TOMACSM OFFISTORY N V CAMBRIGGE TOMACSM OFFISTORY N V CAMBRIGGE TOMACSM OFFISTORY N V OFFISTORY OFFISTO</td><td>AM Antificação Antificação N CATRIGAÇÃO N TITISAGOS III MI Material de Brouga 1 TUMACSAN 04/02/2001 N V 04/02/2002 1/17/5/2004 III MI Material 1 TUMACSAN 09/01/2000 N V 03/19/2002 1/17/5/2004 III MI Caccada 1 TUMACSAN 09/01/2000 N V 03/19/2002 2 4 III MI Caccada 1 TUMACSAN 09/01/2000 N V 03/19/2002 C 2 4 III MI Caccada 1 TUMACSAN 09/01/2000 N Y 04/09/2002 T 2 4 Internet 1 TUMACSAN 11/11/2001 N Y 04/09/2002 T 1 T A A 04/09/2002 T 1 T A N 04/09/2002 T 2 4 A 04/0</td><td>AM Anticologie Brough 1 TDMAGSW 05/12/2003 N Y CARGEOGRAPH 1/1/15/2004 Titler MI Markelage 1 TDMAGSW 04/02/2003 N Y 04/02/2003 05/15/2004 Titler MI Markelee 1 TDMAGSW 09/01/2000 N Y 04/02/2002 05/15/2004 Ch MI Markelee 1 TDMAGSW 09/01/2000 N Y 04/05/2002 24 Ch MI Lokedwel 1 TDMAGSW 09/01/2000 N Y 04/05/2002 TDM Ch MI Arturn 1 TDMAGSW 09/01/2000 N Y 04/05/2002 TDM Ch MI Arturn 1 TDMAGSW 09/01/2000 N Y 04/05/2002 TDM MI Lebrard 1 TDMAGSW 09/01/2000 N Y 04/05/2002 TDM MI Lebrard 1 TDMAGSW 09/01/2000 N Y 04/05/2002 MI Lebrar</td><td> A. A. A. A. A. C. A. A.</td><td> M</td><td> M. M. Activage Brough</td><td> M. M. Archivage Brough</td><td> M. M. Archivage Brough</td><td> A. A. Antonogy Brough 1 TOMAGSM 05152023 N Y G0070202 C01752020 TOMAGSM 05012020 N Y G0070202 TOMAGSM 050120200 N Y G0070202 TOMAGSM 05012020 N Y G0070202 TOMAGSM 050120200 N Y G00702020 TOMAGSM 050120200 N Y G00702020 TOMAGSM 050120200 N Y G00702020 TOMAGSM 050120200 TOMAGSM 050120200 N Y G00702020 TOMAGSM 050120200 N Y G00702020 TOMAGSM 0501202000 N Y G00702020 TOMAGSM 050120200 TOMAGSM 050120200 N Y G00702020 TOMAGSM 0</td><td> A. A. Antoning Balough</td><td> A. A. Actorage Brough</td><td> Machine Mach</td><td> Machine Charles Thurwes Thurwes Thurwes Machine Thurwes Thur</td><td> The Actionage Brough The Actionage Brough</td><td> The control of the</td><td> M. A. A. M. Charlogue Brough</td><td> M. A. A. M. C. A. M. C. A. M. A. A. M. C. A. M</td><td> M. A. A. A. M. M. M. A. M. M. M. M. A. M. M. M. A. M. M.</td><td> M. A. A. A. M. M.</td></td></td<> | ARK Anchrolage Brough 1 TOMAGSM 551 5:7003 N Y 04:09:7003 FIFTSON3 Intert MI Kaleaska 1 TOMAGSM 051 5:7003 N Y 04:09:7002 051:57:004 Intert MI Massilee 1 TOMAGSM 09:01:1000 N Y 08:19:2002 051:57:002 Intert MI Massilee 1 TOMAGSM 09:01:1000 N Y 09:19:2002 051:57:002 Intert MI Lake 1 TOMAGSM 09:01:1200 N Y 09:19:2002 051:18:2002 Intert MI Charlevox 1 TOMAGSM 09:01:1200 N Y 04:09:2002 051:18:2002 Intert MI Charlevox 1 TOMAGSM 09:01:1200 N Y 04:09:2002 051:18:2002 Intert MI Charlevox 1 TOMAGSM 09:01:1200 N Y 04:09:2002 051:18:2002 Intert MI Charlevox 1 TOMAGSM 09:01:12000 N Y </td <td> Observation Activities Activities Activities Activity Activity </td> <td> M. M. Archrogge Brough TOMAJGSM OSTISTOD N Y CALOSCOIC OSTISTOD </td> <td> M. 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A. A. A. A. C. A. A.</td> <td> M</td> <td> M. M. Activage Brough</td> <td> M. M. Archivage Brough</td> <td> M. M. Archivage Brough</td> <td> A. A. Antonogy Brough 1 TOMAGSM 05152023 N Y G0070202 C01752020 TOMAGSM 05012020 N Y G0070202 TOMAGSM 050120200 N Y G0070202 TOMAGSM 05012020 N Y G0070202 TOMAGSM 050120200 N Y G00702020 TOMAGSM 050120200 N Y G00702020 TOMAGSM 050120200 N Y G00702020 TOMAGSM 050120200 TOMAGSM 050120200 N Y G00702020 TOMAGSM 050120200 N Y G00702020 TOMAGSM 0501202000 N Y G00702020 TOMAGSM 050120200 TOMAGSM 050120200 N Y G00702020 TOMAGSM 0</td> <td> A. A. Antoning Balough</td> <td> A. A. Actorage Brough</td> <td> Machine Mach</td> <td> Machine Charles Thurwes Thurwes Thurwes Machine Thurwes Thur</td> <td> The Actionage Brough The Actionage Brough</td> <td> The control of the</td> <td> M. A. A. M. Charlogue Brough</td> <td> M. A. A. M. C. A. M. C. A. M. A. A. M. C. A. M</td> <td> M. A. A. A. M. M. M. A. M. M. M. M. A. M. M. M. A. M. M.</td> <td> M. A. A. A. M. M.</td> | Observation Activities Activities Activities Activity Activity | M. M. Archrogge Brough TOMAJGSM OSTISTOD N Y CALOSCOIC OSTISTOD | M. 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A. A. A. A. C. A. | M | M. M. Activage Brough | M. M. Archivage Brough | M. M. Archivage Brough | A. A. Antonogy Brough 1 TOMAGSM 05152023 N Y G0070202 C01752020 TOMAGSM 05012020 N Y G0070202 TOMAGSM 050120200 N Y G0070202 TOMAGSM 05012020 N Y G0070202 TOMAGSM 050120200 N Y G00702020 TOMAGSM 050120200 N Y G00702020 TOMAGSM 050120200 N Y G00702020 TOMAGSM 050120200 TOMAGSM 050120200 N Y G00702020 TOMAGSM 050120200 N Y G00702020 TOMAGSM 0501202000 N Y G00702020 TOMAGSM 050120200 TOMAGSM 050120200 N Y G00702020 TOMAGSM 0 | A. A. Antoning Balough | A. A. Actorage Brough | Machine Mach | Machine Charles Thurwes Thurwes Thurwes Machine Thurwes Thur | The Actionage Brough The Actionage Brough | The control of the | M. A. A. M. Charlogue Brough | M. A. A. M. C. A. M. C. A. M. A. A. M. C. A. M | M. A. A. A. M. M. M. A. M. M. M. M. A. M. M. M. A. M. | M. A. A. A. M. |

PSAP	PSAP Name	PSAP State	PSAP County	Implementation Phase	Alf Interface	Mednast waga	Date PSAP Request Withdrawn	Invaild Request	Deployed	Date 2 Deployed	Date Projected	Reasons	Comment
0001	Roberts County Sheriffs Office	TX	Roberts	1	TDMA/GSM			N	Y	02/23/2001	_	L	
6995	Wheeler County Sheriffs Office	TX	Wheeler	11	TDMA/GSM	10/12/1999		N	Y	02/23/2001			
0862	Robertson County Sheriff	TX	Robertson	11	TDMA/GSM			N	Y	04/15/2001			
	Burleson County Sheriffs Office	ΤX	Burleson	1	TDMA/GSM			N	Y	04/15/2001	_		
6726	Leon Sherriffs Office	ΤX	Leon	1	TDMA/GSM	_10/12/1999	L	N	Y	04/15/2001	I		
6978	Washington County Sheriffs Department	TX	Washington	11	TDMA/GSM	10/12/1999		N	Υ	04/15/2001			
	Anderson Sheriffs Office	TX	Anderson	1	TDMA/GSM	10/12/1999		N	Y	01/10/2003		· -	
6966	Van Zandt Sheriffs Office	TX	Van Zandt	1	TDMA/GSM	10/12/1999		N	Y	01/10/2003			
6492	Coleman Police Department	TX	Coleman	1	TDMA/GSM	10/12/1999		N	Y	03/08/2001			
6462	Brownwood Police Department	TX	Brownwood	1	TDMA/GSM	10/12/1999		N	Y	03/08/2001			
6500	Cornanche County Sheriffs Office	TΧ	Comanche	1	TDMA/GSM	10/12/1999		N	Y	03/08/2001			
6873	Runnels County Sherffs Office	ΤX	Runnels	1	TDMAGSM		-	N	Y	03/08/2001			1
6555	Eastland County Central Dispatch	TX	Eastland	1	TDMA/GSM			N	T Y	02/21/2001			
6415	Austin County Sheriffs Department	TX	Austin	1	TDMA/GSM	01/14/2002		N	†	03/13/2003			
6415	Austin County Sheriffs Department	TX	Austin	2	TDMA/GSM	01/28/2003		N N	i n	25/15/2003	TBD	46	Dobson cell sites lined like a
													"string of pearls." Working with Grayson on solution that will meet accuracy standards. Dobson has informed PSAP of technical problems and has discussed afternative solutions with PSAP.
6641	Henderson County Sheriffs Department	TX	Henderson	1	TDMA/GSM	01/09/2003		N N	N		08/15/2003	1	
3235	Talbot County Emergency Management Ag	MD	Talbot	1	TDMA/GSM		 	N	Y	05/21/2003	05/15/2505		
3227	Keni County Emergency Management	MAD	Kent	1	TDMA/GSM		 	N	N	00.21,2005	10/23/2003	 -	
3232	Somersel County Department of Emourage	MD	Somerset	1	TDMA/GSM		 	N	N		01/23/2004	 -	
3233	St Marys County Emergency Communicate	MD	St Mary's	- 1	TDMAVGSM			N	N		01/03/2004		
3233	St Marys County Emergency Communicate	MD	St Mary's	2	TDMA/GSM		 	Y	N	ļ	TBD	<u> </u>	
3214	Caroline County Emergency Management	MD	Caroline	1 1	TDMA/GSM		 	N -	N		10/09/2003		
5887	Ene County 9-1-1 Center	PA	Ene	1	TDMA/GSM		†	<u> </u>	<u> </u>	02/06/2002	10/03/2003		
5887	Ene County 9-1-1 Center	PA	Ene	2	TDMA/GSM	04/12/2001		N	2	52/55/2002	08/29/2003	246	PDE hardware has been shipped, third party provider to begin installation in early August
5074	Crawford County Office of Emergency Serv		Crawford	1	TDMA/GSM	03/26/2002		N	Y	02/19/2003			
5031	Allegany County Shenffs Office	NY	Allegany	1	TDMA/GSM	07/18/2002		N	Ÿ	03/26/2003			
5040	Allegany County Sheriffs Office	NY	Allegany	2	TDMA/GSM	06/13/2003		Y	N		12/13/2003		 -
5048	Cattaraugus County Sheriffs Office	NY	Cattaraugus	1	TDMA/GSM	05/22/2001		N	Υ Υ	08/06/2002			
	Cattaraugus County Sheriffs Office	NY	Cattaraugus	2	TDMA/GSM	06/05/2002		N	N		08/29/2003	2,4,6	PDE hardware has been shipped, third party provider to begin installation in early August
5051	Chautauqua County Sheriffs Office	NY	Chaulaugua	 	TDMA/GSM	06/01/2001	 	N	 	05/17/2002			
5051	Chautaugua County Sheriffs Office	NY	Chautauqua	2	TDMA/GSM		\vdash	'Y	N N	33/11/2002	TBD	26	
_5084	Genesee County Sheriffs Office	NY	Genesee	 	TDMA/GSM	04/10/2001	†	<u> </u>	<u> </u>	11/21/2002	100		
5084	Genesee County Sheriffs Office	NY	Genesee	2	TDMA/GSM			N	N	1.02.002	08/29/2003	2,4,6	PDE hardware has been shipped, third party provider to begin installation in early August

AFFIDAVIT OF RONALD L. RIPLEY

I. Ronald L Ripley, do hereby declare that the following is true and accurate:

I am an officer of Dobson Cellular Systems, Inc ("DCS")

I have reviewed the DCS E911 Quarterly Report ("Report") and to the best of my knowledge, information, or belief, all of the information contained in the Report is truthful and accurate

Ronald L Ripley Vice President &

Senior Corporate Counsel

Executed on July 31, 2003

CERTIFICATE OF SERVICE

I, LaVon Stevens, hereby certify that on the 1st day of August 2003, I caused copies of the foregoing "E911 Quarterly Report" to be sent by either first class mail, postage pre-paid, or by hand delivery (*) to the following:

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Chief
Enforcement Bureau
Federal Communications Bureau
445 12th Street, S.W., Room 7C-485
Washington, D.C. 20554

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W. Mark Adams Executive Director, NENA 422 Beecher Road Columbus, OH 43230

Evelyn Barley President, NASNA State of Vermont Enhanced 911 Board 94 State Street Drawer 20 Montpelier, VT 05620 John Muleta*
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